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Before the

Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Advanced Television Systems and Their Impact Upon the Existing Television Translator Services located in Oklahoma, Texas and New Mexico.	))))	MM Docket No. 87-268

Comments on the sixth notice of proposed rulemaking (from Arnold Cruze)

To: The Commission

Arnold Cruze, DBA/ Northfork TV Translator Systems, Copper Breaks TV Translator Systems, Southwest TV Translator Systems, Valley TV Systems, Cruze Electronics, owns and operates 42 Television Translator Stations . Cruze Electronics provides maintenance and consulting engineering to 95 additional stations. It has taken over 30 years to establish these services to RURAL AMERICA in Oklahoma, Texas and New Mexico.

If the Commission Eliminates the use of Channels 60 to 69 the following will happen. 30 of these stations presently operate in the 60 to 69 spectrum and will be displaced or shut down. 18 additional stations will be displaced or shut down that receive their input signal from the lost 60 to 69 channels. 34 additional stations will be displaced that operate in the 14 to 59 as the new DTV stations go on the air. This means that 82 of the 137 (60%) Television Translator Stations mention above will be displaced or shut down.

Due to the large number of licensed Translators & LPTV Stations and Full Power Stations operating in the 14 to 59 spectrum in this area of the country and the new DTV Stations coming on line in the near future, it will be difficult to relocate displaced Translator Stations presently licensed between channels 14 and 59. The majority of the Translator Stations presently licensed to channels 60 to 69 will not be able to relocate to a new channel and will be forced out of service.

Thousands and thousands of square miles of RURAL AMERICA will loose LOCAL Television service and over 50 Cable TV Systems that depend on these Translator Stations for their input signal will loose service. Without local news and weather during the tornado season this could be a deadly situation to hundreds of RURAL COMMUNITIES.

In the cases where channels can be moved the cost will be large. Transmitters will have to be re-channeled or replaced, transmitting antennas replaced and additional ones added in cases where combining multi channels into 1 antenna isn't possible, new transmission lines for the additional antennas, towers strengthen or replaced to hold the additional equipment and the input channels will have to switch to microwave inputs in situations were Translator signals can't be used due to interference. Note: 30% of the Translators presently use off the air signals from the Mother stations, the remaining 70% receive inputs signals via Translator Stations.

These Translator Stations operate from voluntary donations received at the local level. In some cases additional funds are received from the primary stations and Cable TV Systems that use the Translator Stations signal. With the limited funding available to Television Translator Stations it will be impossible to make these changes.

Some of the possible solutions to preserving local Television service to rural America are listed below.

1. Preserve the use of Channels 60 to 69 for Translator Stations presently licensed to operate in this spectrum and a place for displaced Translator Stations to move during the transition to DTV.

2. Remove the UHF Taboos that cause minor or no interference to co-located Stations. This has been proven in actual service at many locations, when waivers have been issued by the FCC.

3. The possibility of considering a compression system to compress several signals into one Translator Station. Funding should be made available for researching and developing this type of service to provide an alternative location for displaced Stations and offer a location for new Translator Stations.

4. Displaced Stations moving to a new channel and Stations that must add additional equipment to receive a input signal, should be compensated for their expense.

The problems that I have discussed are all located within a 175 mile radius of Memphis, TX a small community located in the Texas panhandle. The same problems will exist in all parts of Rural America that depend on Television Translators for their reception of Local Stations. These Stations may be licensed as a secondary service but to Rural America they are **primary** and the Commission must find a way to preserve this valuable service to all parts of Rural America.

Respectively submitted

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Licensee	Call	Station	Location
Northfork TV SYR	K60CK	KJTL-WFT	Sayre, OK 17.7 KM SSW
Northfork TV SYR	K62BQ	KOKH-OKC	Sayre, OK 17.7 KM SSW
Northfork TV SYR	K64AX	KFOR-OKC	Sayre, OK 17.7 KM SSW
Northfork TV SYR	K66AQ	KOCO-OKC	Sayre, OK 17.7 KM SSW
Northfork TV SYR	K68AU	KWTV-OKC	Sayre, OK 17.7 KM SSW
CBTV QUH	K61BY	KJTL-WFT	Quanah, TX, 8 KM S
CBTV QUH	K63BE	KFDX-WFT	Quanah, TX, 8 KM S
CBTV QUH	K65BF	KAUZ-WFT	Quanah, TX, 8 KM S
CBTV QUH	K67BO	KVII-AMA	Quanah, TX , 8 KM S
CBTV QUH	K69EP	KFDA-AMA	Quanah, TX, 8 KM S
Valley TV QTQ	K60BW	KCIT-AMA	Quitaque, TX, 6.4 KM NW
Guymon TV Xlator	K61FN	KCIT-AMA	Guymon, OK, 1.6 KM ESE
Guymon TV Xlator	K63DM	KAMR-AMA	Guymon, OK, 1.6 KM ESE
Guymon TV Xlator	K65DS	KVII-AMA	Guymon, OK, 1.6 KM ESE
Guymon TV Xlator	K69EQ	KFDA-AMA	Guymon, OK, 1.6 KM ESE
Tucumcari UHF TV	K69BC	KVII-AMA	Tucumcari Mountain 5 KM S
KFDA Bovina, TX	K63CA	KFDA-AMA	Bovina, TX 7.2 KM NNE
KFDA Dora, NM	K67CS	KFDA-AMA	Dora, NM 9.7 KM S
C L & O PRY	K62DD	KACV-AMA	Perryton, TX 30.5 KM S
C L & O PRY	K64AC	KFDA-AMA	Perryton, TX 30.5 KM S
C L & O PRY	K66AB	KAMR-AMA	Perryton, TX 30.5 KM S
C L & O PRY	K68AD	KVII-AMA	Perryton, TX 30.5 KM S
Shafer WDR	K61CW	KFOR	NNE, Woodward, OK
Shafer WDR	K63CF	KOCO-OKC	NNE, Woodward, OK
Shafer WDR	K65CO	KWTV-OKC	NNE, Woodward, OK
Shafer WDR	K67CW	KOKH-OKC	NNE, Woodward, OK
Shafer WDR	K69DH	KOCB-OKC	NNE, Woodward, OK
Shafer ALV	K60ER	KWTV-OKC	E, Alva, OK
Shafer ALV	K62EH	KOCO-OKC	E, Alva, OK
Shafer ALV	K64EA	KWTV-OKC	E, Alva, OK

30 Stations that would have to be moved to new channels if Ch. 60-69 sold at auction. Also over 50 Cable TV systems would loose their input signal for local TV stations.

Licensee	Call	Station	Location
Southwest TV HOL	K51CV	KOKH-OKC	Hollis, OK 9.7 KM NE
Southwest TV HOL	K55BQ	KFOR-OKC	Hollis, OK 9.7 KM NE
Southwest TV HOL	K57BB	KWTV-OKC	Hollis, OK 9.7 KM NE
Southwest TV HOL	K59BI	KOCO-OKC	Hollis, OK 9.7 KM NE
CBTV QUH	K65BF	KAUZ-WFT	Quanah, TX, 8 KM S
KFDA Clovis, NM	K26CD	KFDA-AMA	Clovis, NM 3.3 KM N
C L & O GLA	K29BR	KAMR-AMA	Glazier, TX 9.65 KM NW
C L & O GLA	K33CQ	KVII-AMA	Glazier, TX 9.65 KM NW
C L & O GLA	K35CE	KFDA-AMA	Glazier, TX 9.65 KM NW
C L & O FOL	K45AU	KVII-AMA	Follet, TX 9.65 SW
C L & O FOL	K49BB	KAMR-AMA	Follet, TX 9.65 KM SW
C L & O FOL	K51BC	KFDA-AMA	Follet, TX 9.65 KM SW
Shafer ALV	K56FK	KOCB-OKC	E, Alva, OK
Shafer ALV	K58EM	KOKH-OKC	E, Alva, OK
Shafer GAG	K16DX	KOKH-OKC	N, Gage, OK
Shafer GAG	K18BV	KFOR-OKC	N, Gage, OK
Shafer GAG	K20BR	KOCO-OKC	N, Gage, OK
Shafer GAG	K22BR	KWTV-OKC	N, Gage, OK

18 stations would loose input signal if Ch. 60-69 is lost to auction. Also over 50 Cable TV systems would loose their local TV stations input signal.